

November 21, 2002

Mr. Thomas Coutu  
Site Vice President and Interim Plant Manager  
Kewaunee Nuclear Power Plant  
Nuclear Management Company, LLC  
N490 State Highway 42  
Kewaunee, WI 54216

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL  
INFORMATION FOR PROPOSED AMENDMENT REQUEST, "CORE  
OPERATING LIMITS REPORT" (TAC NO. MB5717)

By letter dated July 26, 2002, Nuclear Management Company, LLC (NMC or the licensee) submitted a request for a proposed amendment revise Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TSs) for Core Operating Limits Report (COLR) implementation. The proposed amendment requests relocation of cycle dependent variables from the TSs to a formal report COLR.

The Nuclear Regulatory Commission (NRC) staff finds that the additional information identified in the enclosure is needed.

A draft of the request for additional information was e-mailed to Mr. G. Riste (NMC) on October 31, 2002.

A phone call was held between G. Riste (NMC), Bill Hennessey (NMC), Jeff Voski et. al., S. Peters (NRC), and myself on April 19, 2002, to discuss the questions to ensure that there was no misunderstanding. Also, the phone call established a mutually agreeable response date of 30 days from the date of this letter.

Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

*/RA/*

John G. Lamb, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Request for Additional Information

cc w/encl: See next page

November 21, 2002

Mr. Thomas Coutu  
Site Vice President and Interim Plant Manager  
Kewaunee Nuclear Power Plant  
Nuclear Management Company, LLC  
N490 State Highway 42  
Kewaunee, WI 54216

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL  
INFORMATION FOR PROPOSED AMENDMENT REQUEST, "CORE  
OPERATING LIMITS REPORT" (TAC NO. MB5717)

By letter dated July 26, 2002, Nuclear Management Company, LLC (NMC or the licensee) submitted a request for a proposed amendment revise Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TSs) for Core Operating Limits Report (COLR) implementation. The proposed amendment requests relocation of cycle dependent variables from the TSs to a formal report COLR.

The Nuclear Regulatory Commission (NRC) staff finds that the additional information identified in the enclosure is needed.

A draft of the request for additional information was e-mailed to Mr. G. Riste (NMC) on October 31, 2002.

A phone call was held between G. Riste (NMC), Bill Hennessey (NMC), Jeff Voski et. al., S. Peters (NRC), and myself on April 19, 2002, to discuss the questions to ensure that there was no misunderstanding. Also, the phone call established a mutually agreeable response date of 30 days from the date of this letter.

Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

**/RA/**

John G. Lamb, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Request for Additional Information

cc w/encl: See next page

DISTRIBUTION:

PUBLIC	OGC	THarris	
PD III-1 R/F	JLamb	ACRS	GGrant, RIII

ACCESSION NO. ML023260044

OFFICE	PDIII-1/PM	PDIII-1/LA	PDIII-1/SC
NAME	JLamb	THarris	LRaghavan
DATE	11/20/02	11/15/02	11/21/02

**OFFICIAL RECORD COPY**

REQUEST FOR ADDITIONAL INFORMATION (RAI)

REGARDING PROPOSED CORE OPERATING LIMITS REPORT (COLR) AMENDMENT

KEWAUNEE NUCLEAR POWER PLANT

DOCKET NO. 50-305

1. Your proposed TS 1.0.r.b, "Shutdown Margin (SDM)," states that the SDM is calculated assuming the fuel and moderator temperatures are changed to the program temperature. NUREG-1431, Vol. 1, Rev. 2, "Standard Technical Specifications, Westinghouse Plants," on the other hand, states that the SDM should be calculated assuming the temperatures are changed to the "nominal zero power design level." What is the difference between "program temperature" and "nominal zero power design level?" If there is a difference, why is it acceptable to use "program temperature" for establishing SDM?
2. In TS 2.1, "Safety Limits, Reactor Core," you added peak fuel centerline limits. NUREG-1431 and WCAP-14483-A, "Generic Methodology for Expanded Core Operating Limits Report," both suggest using a peak fuel centerline temperature adjusted for fuel burnup. How did you determine your proposed limit of 4700 degrees Fahrenheit and why is this value acceptable? Also, up to what levels of fuel burnup did you account for when determining this value?
3. WCAP-14483-A requires that the COLR analytical methods be provided in your technical specifications (TSs). What analytical method did you use to calculate the OTDT and OPDT trip setpoints? Is this method included in your TSs? Are there any required analytical methods missing from your proposed TSs?
4. NUREG-1431 shows that the maximum upper limit for Moderator Temperature Coefficient needs to be included in the TSs. Your proposed TS 3.1.f.3 does not include this limit. Why is this proposal acceptable?
5. Your proposed Figure 2 of the COLR does not match the original Figure TS 3.10-1. Specifically, the required shutdown reactivity at 0 full power equilibrium boron concentration increased from 2000 pcm to 2200 pcm. Why is this change acceptable? Did you perform a 50.59 evaluation for this change?
6. Kewaunee TS 3.8.a.5, "Refueling Operations," requires that a shutdown margin of greater than 5 percent Delta k/k be maintained during refueling operations. However, you did not retain this requirement in your proposed COLR. Explain why this omitting this value from the COLR is acceptable.

ENCLOSURE

Kewaunee Nuclear Power Plant

cc:

John H. O'Neill, Jr.  
Shaw Pittman, Potts & Trowbridge  
2300 N. Street, NW  
Washington, DC 20037-1128

David Molzahn  
Nuclear Asset Manager  
600 North Adams Street  
Green Bay, WI 54307-9002

David Zellner  
Town Chairman - Town of Carlton  
N2164 County B  
Kewaunee, WI 54216

Sarah Jenkins  
Electric Division  
Public Service Commission of  
Wisconsin  
PO Box 7854  
Madison, WI 53707-7854

Larry L. Weyers  
Chairman, President, and CEO  
Wisconsin Public Service Corporation  
600 North Adams Street  
Green Bay, WI 54307-9002

NRC NRR Project Manager  
Mail Stop O-8-H-4A  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Resident Inspectors Office  
U.S. Nuclear Regulatory Commission  
N490 Hwy 42  
Kewaunee, WI 54216-9510

Regional Administrator  
Region III  
U.S. Nuclear Regulatory Commission  
801 Warrenville Road  
Lisle, IL 60532-4351

Ave M. Bie, Chairperson  
Public Service Commission of  
Wisconsin  
PO Box 7854  
Madison, WI 53707-7854

Roy Anderson  
Chief Nuclear Officer  
Nuclear Management Company, LLC  
700 First Street  
Hudson, WI 54016